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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSE VILLANUEVA,
Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.,
Defendants.

CASE NO. 2:24-cv-00125-ART-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(Second Request)
[ECF NO. 22]**

The parties held a supplemental scheduling conference due to the recent appearance of counsel for Plaintiff (Plaintiff was previously pro se) under Federal Rule of Civil Procedure 26(f) on April 4, 2025. The parties now submit a Stipulation to Extend Discovery Deadlines (Second Request) and request that the current deadlines be extended for 180 days from the deadlines established in the Scheduling Order [ECF No. 19] filed March 7, 2025 and the Stipulation to Extend Expert Disclosure Deadline [ECF No. 22] filed March 28, 2025. This extension is sought so new counsel can get up to speed on the case and the typical amount of time can be allotted.

I. DISCOVERY COMPLETED TO DATE

The parties have exchanged their Initial Rule 26 Disclosures.

II. DISCOVERY YET TO BE COMPLETED

The parties will each serve and respond to written discovery (Interrogatories, Requests for Admissions and Requests for Production of Documents), serve any necessary third-party subpoenas, retain experts and disclose expert reports and any necessary rebuttal expert reports, and depose parties and witnesses.

1 **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

2 As stated above, Counsel for Plaintiff recently appeared in this case. Counsel requires
3 additional time to get up to speed on the case. In addition, Plaintiff is currently incarcerated and it
4 is anticipated that there may be delays in communicating with Plaintiff. There is good cause for the
5 requested extension.

6 **IV. PROPOSED EXTENDED DEADLINES**

7 The parties respectfully request this Court enter an order as follows:

- 8 1. Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and add
9 parties is **July 3, 2025**.
- 10 2. Discovery: The deadline to complete discovery in this action is **October 1, 2025**.
- 11 3. Expert and Rebuttal-Expert Disclosures. The deadline to disclose experts is **August 4, 2025**.
12 The deadline to disclose rebuttal experts is **September 3, 2025**.
- 13 4. Dispositive Motions. The deadline to file dispositive motions is **October 31, 2025**.
- 14 5. Pretrial Order. The deadline to file a pretrial order is **December 1, 2025**. If dispositive
15 motions are filed, the deadline for filing the joint pretrial order will be suspended until 30
16 days after the decision on the dispositive motions or further court order.
- 17 6. Extensions or Modification of the Discovery Plan and Scheduling Order. In accordance with
18 LR 26-3, applications to extend any date set by the discovery plan, scheduling order, or other order
19 must, in addition to satisfying the requirements of LR 6-1, be supported by a showing of good cause
20 for the extension. All motions or stipulations to extend a deadline set forth in a discovery plan shall
21 be received by the Court not later than 21 days before the expiration of the subject deadline. A
22 request made after the expiration of the subject deadline shall not be granted unless the movant
23 demonstrates that the failure to set was the result of excusable neglect. Any motion or stipulation
24 to extend a deadline or to reopen discovery shall include:
 - 25 (a) A statement specifying the discovery completed;
 - 26 (b) A specific description of the discovery that remains to be completed;
 - 27 (c) The reasons why the deadline was not satisfied or the remaining discovery was not
28 completed within the time limits set by the discovery plan; and

(d) A proposed scheduled for completing all discovery.

The parties submit that good cause exists for an extension of the current deadlines. The parties seek additional time so that Counsel has sufficient time to evaluate the case and determine if it is necessary to move to amend the complaint and/or file any other motions. Additional time is also needed so that the parties will have sufficient time to complete the necessary discovery. This request is timely. This brief delay will not impede this matter. No trial has been set and dispositive motions have not yet been filed.

Dated this 17th day of April, 2025.

Dated this 17th day of April, 2025.

BREEDEN & ASSOCIATES, PLLC

KAEMPFER CROWELL

/s/ Adam J. Breeden, Esq.

/s/ Lyssa S. Anderson, Esq.

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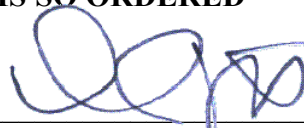
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Attorneys for Defendants

IT IS SO ORDERED



UNITED STATES MAGISTRATE JUDGE

DATED: 4/18/2025